

**Performance Audit  
Implementation of the  
Red Flag Commission's  
Recommendations**

December 1998

**City Auditor's Office**

**City of Kansas City, Missouri**

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December 14, 1998

Honorable Mayor and Members of the City Council:

This audit of the implementation of the recommendations of the Red Flag Commission was initiated in December 1997. The audit was requested in a recommendation included in the commission's January 1997 report.

The Red Flag Commission was established by Mayor Emanuel Cleaver II in response to a wave of public corruption prosecutions involving elected city officials. The mayor asked the group of seven business and community leaders to examine the "processes, procedures, and monitoring of contracts at City Hall." The resulting report made recommendations directed at improving contracting procedures, promoting open ethical government, and defining the proper relationship between the City Council and city staff.

Our audit found that city staff has made progress implementing the recommendations relating to contracting. The Contract Workgroup has developed a draft contracting guidebook that describes procedures and provides templates and boilerplates covering various types of city contracts. We also found that additional work is needed, particularly in the areas of further developing procedures for handling exceptions to usual circumstances. We made a number of recommendations directed toward further improving the contracting process.

Our audit also found that little progress has occurred in the implementation of recommendations relating to ethics. The commission had recommended that both the City Council and the city staff develop a clear definition of what is proper and improper contact between members of council and the staff. Once that definition was developed, city staff and new members of City Council were to receive training on the subject, and procedures were to be developed for handling situations where breaches of propriety are suspected.

Two committees have been working on ethics issues: the Council Ethics/Relations Committee made up of councilmembers, and the Administrative Services Ethics Committee composed of management staff. We found, however, that neither committee had yet to define appropriate contact between staff and council. Without a definition of the standards of appropriate behavior, it is not possible to prepare procedures covering situations where those standards have been breached, and councilmembers and staff cannot receive training in proper behavior. As a result, we found that few of the Red Flag Commission's recommendations relating to ethics have been implemented.

We recommend that the committees work together and utilize ethics rules that already exist in the city's charter, code, administrative regulations, and other sources. Once the definition is developed, we recommend the city manager develop procedures describing steps to be taken in cases where it is suspected that the proper lines of authority and responsibility have been breached. We make a number of other recommendations regarding ethics training, publicizing the ethics policy, and establishing a hotline for reporting cases of abuse.

The draft report was sent to the city manager for review on October 20, 1998, and his response is included as an appendix. We appreciate the courtesy and cooperation extended to us during this project by city staff. The audit team for this project was Nancy Hunt, Douglas Jones, and Edina Maltbia.

A handwritten signature in black ink, appearing to read 'Mark Funkhouser', is written over the printed name and title.

Mark Funkhouser  
City Auditor

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# Performance Audit: Implementation of the Red Flag Commission's Recommendations

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## Table of Contents

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Introduction .....	1
Objectives .....	1
Scope and Methodology .....	1
Background .....	2
Findings and Recommendations.....	5
Summary .....	5
Contract Procedures Have Improved.....	5
Ethics Issues Remain Largely Unresolved .....	12
Other Issues .....	18
Recommendations .....	21
Appendix .....	
City Manager's Response.....	23

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## Introduction

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### Objectives

A performance audit is an objective and systematic examination of evidence to independently assess the performance of a government organization, program, activity, or function in order to provide information to improve public accountability and facilitate decision-making.<sup>1</sup>

The objective of this audit is to determine the extent to which recommendations made in the January 1997 Red Flag Commission Report have been implemented.

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### Scope and Methodology

The Red Flag Commission was established to examine the city's contract processes, procedures, and monitoring in light of a wave of public corruption prosecutions involving elected city officials. This audit was not designed or intended to be a full-scale audit of the city's ethics and contracting processes; rather, it was specifically designed to determine the progress made in implementing the commission's recommendations.

The audit included the following methods:

- Reviewing the January 1997 Red Flag Commission Report and status updates issued in June 1997, January 1998, and July 1998.
- Reviewing various legislative and administrative documents including the city charter, Code of Ordinances, City Council resolutions, and Administrative Regulations.
- Interviewing City Council members and city staff.

This audit was performed in accordance with generally accepted government auditing standards, with the exception of the completion of an external quality control review of the office within the last three years.<sup>2</sup> No information was omitted from this report because it was deemed privileged or confidential.

<sup>1</sup> Comptroller General of the United States, *Government Auditing Standards* (Washington D.C.: U.S. Government Printing Office, 1994), p. 14.

<sup>2</sup> The last review was performed in April 1995. A peer review is planned for the current fiscal year.

## **Background**

In November 1996, Mayor Emanuel Cleaver II asked a group of seven business and community leaders to “examine the processes, procedures, and monitoring of contracts at City Hall.” The mayor established the “Red Flag Commission” to restore public confidence in City Hall in the face of a wave of public corruption prosecutions involving elected city officials. The commission conducted public hearings and issued a report that identified problems such as weaknesses in city contracting, inadequate financial oversight, and inappropriate direction of city staff by elected officials. The report included recommendations aimed at improving contracting practices, promoting open ethical government, and defining the proper relationship between the City Council and city staff. The original report was released at a press conference on January 2, 1997.

### **Status of Report Recommendations As Determined through the Audit**

The implementation status of the recommendations included in the original report based on our audit work is provided in Exhibit 1. Three Status Updates have been issued. No Audit Report Tracking System reports were submitted.

## Exhibit 1. Status of Recommendations as Determined by Audit

Red Flag Commission Recommendations	Status
1. Initiate a required orientation for all new Council members as to the proper exercise of and limits to their individual and shared authority for city government, especially including definitions as to what is appropriate and inappropriate contact with city employees.	Partially Implemented
2. There must be a procedure for all parties to follow when someone believes that the proper lines of authority and responsibility have been breached.	Not Implemented
3. The City Council should reaffirm Resolution 961329 on an annual basis.	Implemented
4. The City Manager must help clarify with city employees and maintain for them clear definitions of and structure for enforcement of what is proper and improper contact with Council and conduct by employees.	Not Implemented
5. In cooperation with the Mayor and Council, the City Manager must institute a required training program for all staff on the above.	Not Implemented
6. In accordance with the City Auditor's recommendations to the Municipal Ethics Commission, there must be a required and annual ethics training program with its focus on realistic scenarios for all city staff.	Not Implemented
7. The City Manager must present a report at least on an annual basis, which provides the Council with a status report on the various concerns addressed in this document. In addition the City Manager, using the Audit Report Tracking System (ARTS), should track and report on the progress and implementation of the various recommendations contained herein. Further, the City Auditor should begin an audit on the implementation of these recommendations no later than January 1, 1998.	Partially Implemented
8. The City Manager should appoint an internal auditor reporting directly to the Manager on financial compliance issues.	In Progress
9. While the various purchasing procedures of the City may have appropriate safeguards to minimize many of the challenges that have arisen, problems have occurred especially when steps are taken outside of regular procedures. There is no clear process delineated to indicate how to proceed when exceptions to the regular policies may be called for. There must be a clearly understood procedure to follow, including when going outside of normative contracting formulas.	Partially Implemented

10. Templates (terms and conditions) for each type of city contract must be the same.... While different departments may have different needs in order to carry out their mission, there is no necessity for there to be many different contract procedures for them.... This requires a uniformity of purchasing and contract procedures.	In Progress
11. Business terms and requirements, while part of overall contracts, must be separated from legal terms and conditions.	Implemented
12. There is confusion and over regulation with regard to the procedures and required documents to qualify for minority/women contractor status. The City's goal of increased participation by minority communities may be hindered by this perceived barrier to entry.	Implemented
13. AR 3-30 does not specifically set out how the performance of contracts shall be monitored. It should be amended to include <i>Elements of a Good Monitoring System</i> . Further, the reporting and monitoring elements of AR 3-37 must be incorporated into the compliance process. All departments must have procedures that conform to those administrative regulations.	Partially Implemented
14. There should be two application cycles annually in order to apply for Neighborhood Tourist Development funds. Outside of those periods, (a) applications should not be accepted, or (b) staff should create a procedure for Council's approval within which to formally review applications outside the regular application times.	Implemented
15. The City Auditor's recommendations regarding the neighborhood Tourist Development Fund and the Minor Home Repair Program should be implemented immediately.	Not Determined
16. [A] written cooperative agreement must be developed between the Board of Police Commissioners and the City Council. This must be done to establish more uniformity and control in the expenditure of City funds and in order to maximize efficiencies in the use of those funds.	Not Implemented
17. There should be bi-weekly reporting on and distribution of all payments by the City listed by vendor. This will allow proper internal checks and balances and the fullest public disclosure.	Implemented
18. The City must invest the necessary funds in appropriate state-of-the-art technology and training.	Implemented
19. [W]e recommend the establishment of a confidential ethics hot line which will be accessible to the Council, staff and residents of Kansas City.	In Progress

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## Findings and Recommendations

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### Summary

Implementation of the original Red Flag Commission recommendations has been slow. We were able to identify only six out of 19 recommendations that have been implemented. The former city manager, who originally received the Red Flag Commission report, did not embrace the commission's recommendations. Progress on implementation improved during the most recent six-month reporting period, with plans developed to carry out the recommendations. A great deal more work, however, remains to be completed.

The greatest progress has occurred in the area of contracting procedures. The Contract Workgroup has developed a contract guidebook that incorporated many of the commission's recommendations.

Little progress has occurred, however, in the area of ethics, particularly as related to the relationship between members of the City Council and city staff. Implementation of the recommendations related to this area requires three basic, consecutive steps. First, standards describing appropriate conduct must be developed. Second, the standards must be communicated to council and staff. Finally, procedures must be developed so staff will know what to do when confronted with inappropriate conduct. We found that the first step, defining the standards of conduct, has not yet been completed. As a result, none of the recommendations in this area have been implemented.

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### Contract Procedures Have Improved

The Red Flag Commission identified a number of weaknesses with the city's contract administration and monitoring processes. In order to strengthen contracting processes, the commission recommended developing standardized contract templates, separating business and legal terms to improve contract monitoring, establishing a standard procedure to follow when exceptions to the standard contracting process seems advisable, establishing standard monitoring procedures, clarifying MBE/WBE requirements, and adopting previous recommendations made by the city auditor.

We found that city staff has performed a great deal of work addressing the problems identified in the commission's report. The Contract Workgroup has developed a draft contract guidebook that includes many of the items recommended by the commission. Administrative Regulations (ARs) have been partially updated, and the City Council

revised sections of the city code related to the MBE/WBE program and the Neighborhood Tourist Development Fund.

We also found some areas, however, where further work is needed. An overall policy for handling exceptions to normal contract procedures has not been developed, and policy decisions regarding contract guidebook training or the assignment of responsibility for updating the guidebook have not been addressed. Finally, modifications relating to contract monitoring made in one AR should be incorporated into all ARs relating to contracts.

### **Standardization of City Contracts**

In response to the Red Flag Commission report, a workgroup of city staff members from various departments was established in early 1997 to develop standard terms and conditions for city contracts. Since that time, this group has worked to incorporate many of the commission's recommendations related to the city's contracting processes. The workgroup has developed a contract guidebook describing procedures, terms, forms, and other facets of contracting.

The City Council has also endorsed the concept of standardizing city contracting forms. On June 5, 1997, the council adopted Resolution 970790 which directed the city manager to establish a system that would cause all city departments to use the same procedures and templates for city contracts.

**Contract guidebook developed.** The guidebook is currently in draft form. The anticipated release was May 1998, but was delayed due to the complicated nature of contracts and problems in reconciling requirements in the city charter, city code, administrative regulations, and manual of instructions. A few departments, such as Parks and Recreation, have received portions of the guidebook for testing purposes during the intervening months. As work continues on this project, a revised release date has not been established.

The draft guidebook addresses seven contract categories: common services and commodities; construction services; design professional services; professional, specialized or technical services; non-municipal agency agreements; personal services; and service/maintenance. These categories are not all-encompassing, but comprise the majority of the contracts issued by the city. The category of contract renewals remains to be incorporated. The guidebook further describes common contracting procedures, including addenda, amendments, change orders, emergency contracts, execution of contract documents, insurance and bonds, and ordinance request processing. Each of the sections contains contract forms and checklists.

**Business and legal terms are separated.** Based on the most recent draft of the service/maintenance contract boilerplate, it appears that business and legal terms/conditions have been separated as

recommended by the Red Flag Commission. A private sector contracting professional, who served as a member of the Red Flag Commission, reviewed the guidebook presented in January 1998. He indicated satisfaction with the boilerplates and templates he reviewed, and said that the business and legal terms were separated.

### **MBE/WBE Procedures Have Been Simplified Within Legal Limits**

The Red Flag Commission had reported that "there is confusion and over regulation with regard to the procedures and required documents to qualify for minority/women contractor status. The City's goal of increased participation by minority communities may be hindered by this perceived barrier to entry."<sup>3</sup>

The Human Relations Department worked for the past year updating Chapter 38 of the city code, which includes the city's MBE/WBE program. Staff revised the MBE/WBE certification application form to improve and simplify the form's format and decreased the processing time for certification. The City Council approved new MBE/WBE ordinances in January 1998 and August 1998. The degree of potential change available to the city is restricted by law. The Human Relations Department works within the framework set forth by the United States Supreme Court in the *City of Richmond v. J.A. Croson Co.* and succeeding cases, to remedy discrimination and encourage the development of minority and women business enterprises.

Councilmembers continue to be interested in encouraging minority and women enterprise participation in city contracts. The Human Relations Department tracks MBE/WBE goals and accomplishments. Progress reports have been presented to the City Operations Committee and in Business Sessions.

### **Good Monitoring System Requires Additional Work**

The Red Flag Commission reported that the Administrative Regulation relating to contracts with non-municipal agencies (AR 3-15<sup>4</sup>) "did not specifically set out how the performance of contracts shall be monitored." The report recommended that the AR be amended to include "Elements of a Good Monitoring System," a list originally included in a 1996 special report by the City Auditor's Office and the Office of Management Services entitled *A Model For Public/Private Competition*.

In response to the recommendation, the city manager revised AR 3-15 to incorporate the basic elements. The Red Flag Commission limited its recommendation relating to incorporating monitoring system elements to

<sup>3</sup> *Red Flag Commission Report*, Red Flag Commission, January 1997, p. 3.

<sup>4</sup> The Red Flag Commission's recommendation specified AR 3-30. The ARs were reissued in November 1997. At that time, the numbers of many ARs changed. AR 3-30 became AR 3-15. For simplification, the new AR numbers are used in the text and exhibits for this report.

AR 3-15. In status updates to the commission, city staff reported that the language either had already been incorporated or that they had plans to incorporate the basic monitoring elements into contracting ARs 3-7, 3-12 and 3-20.<sup>5</sup> Our review revealed that many of the planned updates have not yet been completed. (See Exhibit 2.) We recommend that the good monitoring elements be incorporated into all relevant ARs related to contracting.

Exhibit 2. Comparing Good Monitoring Elements to Administrative Regulations

Elements of a Good Monitoring System	Administrative Regulations			
	3-7	3-12	3-15	3-20
Require the contractor to present periodic reports.	No	No	Yes	No
Review those reports carefully for adherence to the written contract.	No	No	Yes	Yes
Compare wage rates and equipment charges for materials or rentals with the contract.	No	No	Yes	Partial
Verify that all services, material, labor, and equipment were actually received, used or consumed.	No	No	Yes	Yes
Initiate all change orders that affect the contract.	No	No	Yes	Yes
Whenever possible, make on-site inspections. Report the results of those inspections, comparing accomplishment to the prescribed specifications.	No	No	Yes	Yes
If site inspections are not feasible (as for a personal service contract as an attorney) keep a record of user department satisfaction.	No	No	Yes	Yes
Follow up on every complaint.	No	No	Yes	Yes
Survey citizen or user satisfaction whenever possible.	No	No	No	No

Sources: John Reh fuss, "Contract Monitoring Systems," *Privatization: Contracting Local Government Services*, (National League of Cities, 1993), p.19 and City Auditor's Office review of selected Administrative Regulations.

The commission's original report included, as an attachment, a set of Guidelines for Implementation of Consultant Services Contracts and recommended that reporting and monitoring elements of AR 3-20 be incorporated into the compliance process. The city's current AR 3-20, (Consultant Services Contracts) continues to reference the detailed guidelines for implementation, however, the guidelines were not included in the November 1997 distribution of revised ARs. We

<sup>5</sup> AR 3-7 Architectural and Engineering Services Contracts; AR 3-12 Contracts for Services; and AR 3-20 Consultant Services Contracts.

recommend that all referenced guidelines be incorporated into the relevant administrative regulation.

At the October 1998 meeting of the Red Flag Commission, members again emphasized the importance of contract monitoring. Monitoring against clear and specific contract performance standards ensures that the products or services purchased are received. We believe that additional attention must be given to clearly defining contract performance, establishing measures of performance, and monitoring for that performance.

### **Policies Remain to Be Addressed**

Although a significant amount of progress has been made in improving the city's contracting process, policies are still needed in several areas included in the Red Flag Commission report. These areas, which were outside the initial scope of the contract workgroup's charge, include procedures for handling exceptions to normal policies and a centralized contracting authority. In addition, several issues related to the contract guidebook need to be addressed.

**Procedures on exceptions are needed.** The commission reported that "problems have occurred especially when steps are taken outside of regular procedures. There is no clear process delineated to indicate how to proceed when exceptions to the regular policies may be called for." The commission recommended that "there must be a clearly understood procedure to follow, including when going outside of normative contracting formulas."<sup>6</sup>

While there has been much work on standardizing the language (terms and conditions) of the city's contracts, the work has not included the development of a formal policy providing clear direction when exceptions to regular contracting policies are needed. Staff involved in developing the standardized contracts informed us that the code, ARs, and manual of instructions include provisions covering specific exceptions. The following note is included in the guidebook index and at the beginning of each sample contract contained in the guidebook:

NOTE: The Law Department has approved the following boilerplate. Notes and section choices have been provided to assist you in customizing this document. Only those deletion choices provided have prior approval of the Law Department. If this boilerplate does not meet your contracting need or you have any questions regarding its use, CONTACT THE LAW DEPARTMENT. Be certain to delete this note before your final contract document is printed.

<sup>6</sup> *Red Flag Commission Report*, p. 2.

A footnote on contract preparation checklists in the guidebook also directs staff to "consult the Law Department for guidance if you have contract specific questions regarding the contracting process or boilerplate to be used."

Although this language provides further direction, we believe a more complete written policy is needed. The city manager and the City Council need to be aware of exceptions being granted. In order to reduce the risk that inappropriate actions could be taken, the city manager should develop a more formal policy requiring the Law Department to be directly involved in assisting contracting departments with exceptions and that his office and the City Council be informed about decisions regarding contracts that are exceptions to regular procedures.

**Control remains decentralized.** The commission's emphasis on templates and standard language reflects its view that purchasing control should be centralized. As the report stated, by eliminating individual departments' "unique template and contracting procedures, vendors will then have the clear understanding that they are contracting with the City and not a particular department. . . There should be decentralized operation, but there must be centralized control."<sup>7</sup> Currently, the city's Purchases and Supplies Division focuses on commodities and general services contracts; all other contracting functions have been delegated to operating departments.

According to a private sector contracting professional who served on the Red Flag Commission: (1) controls over the contracting function begin with standard terms and conditions and the utilization of boilerplates and templates; (2) purchasing or contracting professionals should be consulted when contracts reach a certain dollar amount and they should be involved in all formal bid processes as consultants to the operating department or should actually be responsible for the bid process; and (3) a central contract file that contains one copy, preferably the original, of all contracts should be maintained.

Centralized control over decentralized contracting functions can be further enhanced by periodically reviewing completed contracts to ensure compliance with city contracting policies. Maintaining a central contract file ensures that contracts are easily accessible and available for future review. The city should develop a central contracting authority to review contracts, maintain a master contract file, and provide expertise and assistance to operating departments.

**Policy decisions about guidebook training and revision are needed.** Training, both initial and recurrent, is needed to ensure that all contract administrators are familiar with the contract templates and follow the city's contracting policies and procedures. After the contract guidebook is completed, it will be necessary to revise current sections and add new sections or contract types as legislation, policies, and procedures change.

<sup>7</sup> *Red Flag Commission Report*, p. 3.

These issues were outside the scope of the contract workgroup's assignment. Management has recognized, but not yet addressed, the need to assign responsibility for training and guidebook revision as well as the timing of these functions. The city manager should assign responsibility for training and guidebook revisions.

### **Progress Made Regarding Two City Programs**

The Red Flag Commission Report included recommendations related to two specific city programs, the Neighborhood Tourist Development Fund (NTDF) and the Minor Home Repair Program. Specifically, the commission recommended that the application cycle for the NTDF be revised, and that procedures be developed addressing the handling of applications received outside of the cycles. In addition, the report recommended implementation of recommendations included in the City Auditor's Office's audits of this program and the Minor Home Repair program.

The city code controlling the Neighborhood Tourist Development Fund (NTDF) was amended in 1997 to prohibit contracts for events that had already occurred and to require quarterly, rather than annual, recommendations on the disbursement of funds. The increase in the number of application cycles exceeds the two cycles recommended by the Red Flag Commission. According to information provided by the Neighborhood and Community Services Department, applications outside of the regular application cycle are to be submitted at least 30 days prior to the event for review and approval by the NTDF coordinator. The City Council must approve funding for the application through an ordinance.<sup>8</sup>

### **Assessment of Implementation Status of Previous Recommendations Is Underway**

The commission recommended that the city auditor's recommendations regarding the Neighborhood Tourist Development Fund and the Minor Home Repair Program be implemented immediately. The City Auditor's Office is currently working on follow-up audits of the Neighborhood Tourist Development Fund and the Minor Home Repair Program. Based on the latest ARTS reports, all Minor Home Repair recommendations are reported as implemented. Of the nine Clay-Platte Baseball League (Neighborhood Tourist Development Fund) recommendations, two were withdrawn, two were reported as not implemented, and the five remaining recommendations were reported as implemented.

<sup>8</sup> Neighborhood Tourist Development Fund Procedures Memorandum from Peter Yelorda, Assistant City Manager, Neighborhood and Human Services, to Mayor and Council, July 1, 1997.

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## **Ethics Issues Remain Largely Unresolved**

The original charge of the Red Flag Commission was to examine city contracting procedures. The report itself, however, was not limited to contracting; in addition, it made a number of recommendations relating to ethics of public officials. Six of the Red Flag Commission's original recommendations center around identifying proper conduct between staff and council, procedures for handling breaches of proper lines of authority, and training of council and staff on appropriate conduct.

We found that none of the recommendations related to ethics have been fully implemented. Each of the recommendations is based on the development of a definition of "appropriate and inappropriate contact with city employees." This definition has not been developed. Without a clear definition of appropriate standards of behavior, the Red Flag Commission's remaining recommendations on ethics cannot be implemented.

### **Council, Staff Continue Work on Defining Appropriate Conduct**

The Red Flag Commission recommended that both the City Council and the staff define appropriate contact. The report recommended that the council "initiate a required orientation for all new Council members . . . especially including definitions as to what is appropriate and inappropriate contact with city employees."<sup>9</sup> The report also recommended that the city manager maintain for city employees "clear definitions of and structure for enforcement of what is proper and improper contact with Council."<sup>10</sup> Although the city charter, code, and administrative regulations include language relating to appropriate conduct, neither the councilmember committee nor staff have defined appropriate behavior.

**Council Ethics/Relations Committee.** At the mayor's request, the City Council established the Council Ethics/Relations Committee to examine the appropriate relationship between elected officials and city staff. The committee, composed of councilmembers, has met periodically since September 1997. No project products or timetables have been formally established. Testimony before the committee on staff/council relationships and communications continues, but council procedures have not yet been drafted. Staff to the committee told us that the committee will report its findings to the full council and propose standards of appropriate conduct, which could then be incorporated into council rules. The committee anticipates completing its work prior to the seating of a new council in 1999.

**Committee on Administrative Service Ethics.** The Committee on Administrative Service Ethics, established under Administrative

<sup>9</sup> *Red Flag Commission Report*, p. 1.

<sup>10</sup> *Red Flag Commission Report*, p. 2.

Regulation 1-14, is composed of the city manager or his designee and three department heads. This committee may offer advisory opinions and conduct investigations. Subsequent to the release of the Red Flag Commission report, the committee reviewed the city's codes of ethics and is assisting in the development of educational programs to ensure that employees are acquainted with the code of ethics. The committee is working with Education and Development staff to define appropriate behavior for inclusion in training programs, and has reviewed training budgets, training calendars, and ethics course outlines and materials, including an ethics handbook.

### **Rules Regulating Council/Staff Relations Are Already in Place**

Sections of the city charter and Code of Ordinances address the proper relationship between council and staff. In addition, the City Auditor's Office issued a memorandum in 1995 containing recommendations addressing the appropriate roles for staff and council. These documents could be used as a basis for defining standards of behavior.

**Legal descriptions of appropriate behavior.** The city's Code of Ethics, which applies to all officials and employees, whether elected or appointed, paid or unpaid, is found in the Code of Ordinances. Few references within this text relate specifically to the relationships between staff and council. The code discusses the responsibilities of public office, orientation training, equal treatment, conflicts of interest, acceptance of gifts, and penalties for violating these provisions. Section 19.1 of the city charter authorizes the Municipal Officials Ethics Commission to offer advisory opinions and conduct investigations.

The Law Department provided the Council Ethics/Relations Committee with a list of current charter and code sections controlling the relationship between members of the City Council and the staff. These rules include the following:

- The city does not act through a single council member, but only through the collective action of the council as reflected in an ordinance, resolution or other directive.<sup>11</sup>
- An action of the council must be taken by the council acting in its deliberative capacity. A single member of the council does not have the authority to exercise the powers of the city.<sup>12</sup>
- Council members have access to all records of the city.<sup>13</sup>
- Officials and employees should not exceed their authority or breach the law or ask others to do so, and they should work in full cooperation with other public officials and employees unless

<sup>11</sup> Charter of Kansas City, Missouri, Section 6.

<sup>12</sup> Charter of Kansas City, Missouri, Section 6.

<sup>13</sup> Charter of Kansas City, Missouri, Section 18.

prohibited from so doing by law or by officially recognized confidential nature of their work.<sup>14</sup>

**Administrative Regulations.** Selected portions of the Code of Ethics are repeated in the Administrative Code of Ethics, found in Administrative Regulation (AR) 1-15. ARs are established by the city manager, and as such, the Administrative Code of Ethics specifically excludes elected officials or individuals appointed by elected officials.

**Related correspondence.** In a June 26, 1995 memorandum to the chairman of the Municipal Officials Ethics Commission, the City Auditor's Office recommended that the city manager and City Council affirm two principles. These principles are that:

- Staff has a responsibility to provide public recommendations to the governing body.
- Staff should be directed by the governing body, not by individual councilmembers.

We also recommended that staff should be aware of policies that clarify the relationship between staff and individual councilmembers, and that annual ethics education should be provided.

**Committee efforts should be coordinated.** Since the Red Flag Commission charged both the City Council and the staff to define appropriate contact between members of council and the staff, efforts of the Council Ethics/Relations Committee and the Committee on Administrative Service Ethics should be coordinated. Together with the city manager, these committees should reach agreement on a definition that should then be incorporated into the city's Code of Ethics contained in the city code. The definition would apply to all those connected with city government, including elected and appointed officials, civil service employees, and even unpaid volunteers. Involving the city manager and the City Council in the development of the definition, and incorporating the definition into the city code, will send the message that this is an important issue about which employees have the support of their superiors.

#### **Procedures for Handling Breaches of Propriety Have Not Been Established**

The Red Flag Commission had recommended that a procedure be developed for "all parties to follow when someone believes that the proper lines of authority and responsibility have been breached. No one should be confronted with a choice between doing something they judge inappropriate or the loss of their position."<sup>15</sup> Without a definition of appropriate standards of behavior, it is not possible to determine the

<sup>14</sup> Code of Ordinances, Kansas City, Missouri Section 2-1013 (b).

<sup>15</sup> *Red Flag Commission Report*, p. 1.

appropriate steps to take when the standards of behavior have been breached. As a result, no such procedures have been established.

The Administrative Services Ethics Committee and the Municipal Officials Ethics Commission have the authority to investigate and issue advisory opinions reports/recommendations. However, neither the committee nor the commission would necessarily offer an employee the quick response or immediate support that could be required in circumstances in which an individual councilmember attempts to direct staff.

The city's July 1998 response to the Red Flag Commission report suggested that the Council Ethics/Relations Committee would develop a procedure for reporting a breach in responsibility and authority. A City Council committee, however, may not be the best vehicle by which to establish a procedure for staff to follow when the proper lines of authority and responsibility have been breached.

Staff needs to be assured that city management, up through and including the city manager, will support staff's refusal to carry out inappropriate requests. Because this procedure requires the unqualified support of management and to maintain objectivity, city management should play a key role in developing this procedure. Once established, the proper procedure to follow when the lines of authority have been breached should be included in the employee ethics training. Other media sources, such as the *Fountain Pen*, the city's web site, and paycheck enclosures, could also be used to update or remind staff about the proper procedures to follow.

### **Staff Ethics Training Has Not Been Implemented**

The commission had recommended that "there must be a required and annual ethics training program with its focus on realistic scenarios for all city staff."<sup>16</sup> A staff ethics training program has not yet been implemented. The current budget, however, allocates funds for ethics training. A draft ethics training program has been developed and presented to the Administrative Service Ethics Committee. "Train the trainer" curriculum is being developed.

The staff of the Education and Development Office plan to train all city staff beginning with managers and key employees with contracting or fiduciary responsibilities. The Education and Development Office does not plan to include ethics training in new employee orientation until all current staff is trained. The training is expected to begin in early 1999 and be completed by the end of that year. We recommend that once the program is designed and available, it should immediately be included in the new employee orientation. Ethics training should be provided to staff, contract employees, appointed members of boards and commissions, elected officials, and paid and unpaid staff.

<sup>16</sup> *Red Flag Commission Report*, p.2.

The Education and Development Office expects to provide refresher training for managers and key employees each year and every other year for other employees. Training in ethics is important enough to provide refresher courses to all employees annually. Refresher training need not mean formal classroom activities. Methods to conduct annual ethics training used by other organizations include video tapes, web site, and self-study refresher training. Because frequent training can increase employee sensitivity to ethics issues, we continue to recommend annual ethics refresher training be provided to all city employees.

The draft training materials do not address appropriate and inappropriate contact between council and staff. Limits to council authority should be specifically incorporated into the training materials, along with procedures to follow when a councilmember exceeds those limits.

### **New Councilmember Orientation Has Been Conducted**

The Red Flag Commission recommended that all new councilmembers be required to receive orientation on "the proper exercise of and limits to their individual and shared authority for city government, especially including definitions as to what is appropriate and inappropriate contact with city employees."<sup>17</sup>

As a result of the Red Flag Commission recommendations, the council revised the Code of Ordinances to require that councilmembers and the mayor receive ethics orientation training after election and before taking the oath of office.<sup>18</sup>

Councilmember Kelvin Simmons is the only councilmember elected since the code was amended. The councilmember and his aide attended a government ethics orientation workshop conducted by University of Kansas Professor H. George Frederickson in February 1997. Workshop topics included ethics of council-staff relations in council-manager form of local government. Although various perspectives and issues were discussed, the training did not specifically define appropriate behavior.

Councilmember Simmons informed us that he found the orientation training helpful. He also reported that his aide benefited from the training and suggested that council aides should continue to be included in training sessions.

At the July 1, 1997, Red Flag Commission meeting, the commission members recommended that councilmembers be trained by an outside authority rather than by in-house staff. We concur and repeat this recommendation. In addition, because of the unique and critical position held by council aides, we believe that they should be trained separately

<sup>17</sup> *Red Flag Commission Report*, p. 1.

<sup>18</sup> Code of Ordinances, Kansas City, Missouri, §2-1012.5(a). This amendment to the code was passed on January 23, 1997.

from city staff. While the council aide training should be similar to that received by councilmembers, it could be conducted by in-house staff

**Updates on training have not been prepared.** When the council revised the code to require ethics orientation training, they also required that training include information on legislative procedures and applicable sections of Missouri statutes, such as the Sunshine Law. Section 2-1012.5(c) of the city code requires that the city manager furnish updates on orientation training topics to councilmembers and mayor every six months. No updates have been furnished. We recommend the city manager furnish the updates as required by the code.

### **Ethics Code and Procedures Should Be Publicized**

Rules governing appropriate behavior are included in the city's charter and Code of Ordinances. The city Code of Ethics and other relevant rules and procedures should be publicized so that council and staff have a clear and consistent understanding of appropriate conduct. The Committee on Administrative Service Ethics is working with Education and Development staff to produce a summary ethics document that would be posted in all workplace locations. Ethical rules and procedures will also be provided to employees in ethics training and the Ethics Handbook. Additional city resources such as the *Fountain Pen*, the government cable channel, and the city's web site should also be considered potential information outlets.

### **Hot Line Should Be Established**

The Red Flag Commission's report included 19 recommendations on the roles of the City Council and the Office of the City Manager, and on strengthening procedures. The report's conclusion indicates that the commission realized that "no system can provide a perfect defense against human cupidity."<sup>19</sup> The commission indicated that "while someone with a larcenist heart likely can break any system, we want to encourage others to report such behavior."<sup>20</sup> As a result, the commission recommended the establishment of a confidential ethics hot line.

The confidentiality of calls is crucial to the success of a hotline for two reasons. First, persons intimidated by a supervisor or elected official might not come forward without a guarantee that records were confidential. Second, confidentiality would protect against public embarrassment generated by false or unfounded accusations.

The Red Flag Commission's recommendation to establish a confidential ethics hotline could not be fully implemented until the confidentiality of calls was guaranteed. The Missouri legislature revised the state's Sunshine Law during the 1998 legislative session. Among the revisions approved was a provision that makes confidential citizen and employee

<sup>19</sup> *Red Flag Commission Report*, p. 4.

<sup>20</sup> *Red Flag Commission Report*, p. 4.

reports of potential abuse or wrongdoing to a municipal hotline a closed record.

According to the Association of Certified Fraud Examiners' Report to the Nation on Occupational Fraud and Abuse, a majority of fraud and abuse cases are discovered through tips and complaints. A hotline provides a method of anonymously reporting improper conduct without fear of retribution. Some organizations use subscriber services while others maintain internal hotlines.

Committee Substitute for Ordinance No. 970034 was originally drafted to establish a city hotline to receive information concerning the conduct of city officials and employees. The proposal was eliminated from the semi-annual agenda. Before another ordinance is drafted for council consideration a number of issues must be resolved.

The city manager has appointed a committee to work on the hotline issue. A general plan for the hotline will need to address whether the city will use a subscriber service or maintain the hotline internally, and should include reporting and investigative procedures. The plan should also address who will review the calls; to whom complaints will be forwarded for investigation; procedures for publicizing the hotline number; and the locations at which the hotline number will be posted. We recommend that the city implement a confidential hotline.

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## **Other Issues**

The Red Flag Commission report included information and recommendations regarding several other areas. Progress has been made implementing all but one of these.

**Support for council-manager form of government.** The commission had recommended that the City Council annually reaffirm Resolution 961329 which calls for the city manager form of government with City Council serving as policy maker. The council reaffirmed the resolution on February 5, 1998, as Resolution 980050.

On August 4, 1998, the citizens of Kansas City approved a charter change strengthening the mayor's role in relationship to the council. The changes did not alter the prominent role of the city manager under the city's current system. The changes did create a stronger mayor, however, through closer ties to the manager, veto power over the council, and enhanced authority over the annual city budget. Because of the charter changes adopted in 1998, modification of the resolution language is needed. We recommend that the Law Department review and revise the resolution language and that the City Council continue to annually affirm their support of the council-manager form of government.

**Reporting.** The Red Flag Commission had recommended increased reporting and disclosure of payments by vendor. In response to the recommendation, the council passed an ordinance requiring a bi-weekly report listing all city payments and payments made by the city on behalf of the Police Department to vendors, contractors, suppliers, consultants and others, except as required by law to be confidential or closed. Information is provided for the two-week period preceding the publication of the report and for the fiscal year to date. This information is available on the city's web site for those with Internet access.

**Increased investment in technology.** The commission had recommended that the necessary funds be invested in appropriate state-of-the-art technology and training. The fiscal year 1999 budget includes \$3.2 million for technology issues, much of it for year 2000 programming and upgrades. The contract compliance system, Government Finance System/Financial Management System (GFS/FMS) and Geographic Information System (GIS) are scheduled to receive upgrades or updates.

Computer-related expenditures in the current budget total about \$10.7 million, up from about \$9 million in fiscal year 1998. Technology initiatives include new systems for payroll, permits, cashiering and assessment activities. Other plans include the completion of the change-over from PROFS to Lotus Notes (e-mail systems), connecting all departments to the city's network, tying the permit system into the GIS system, and reviewing the possibility of electronic payments from citizens.

**City Council and Red Flag Commission informed about status of recommendations.** The commission recommended that progress on implementing its recommendations be tracked through the city's Audit Report Tracking System (ARTS). The City Manager's Office released reports in June 1997, January 1998, and July 1998 informing the City Council and Red Flag Commission about the status of recommendations. No reports have been submitted through the Audit Report Tracking System (ARTS). The city auditor initiated his audit on the implementation of the Red Flag Commission's recommendations in December 1997.

The release of this audit should initiate the process that will include ARTS presentations before the Finance and Administration Committee, in addition to updating the Red Flag Commission members on the city's progress.

**Internal auditor position established.** The commission recommended that the city manager appoint an internal auditor reporting directly to the manager on financial compliance issues. On August 4, 1998, Kansas City voters approved changes to the city charter that included the

creation of an internal auditor department.<sup>21</sup> The internal auditor is appointed by and reports to the city manager. The internal auditor will review and investigate activities of the city and entities receiving funds or support from the city, and will perform other work as directed by the mayor, council or city manager. The internal auditor will focus on the prevention and detection of fraud or other public corruption.

Applicants for the internal auditor position have been solicited. A final selection for the position has not yet been made.

### **No Progress Made Securing Written Cooperative Agreement**

The Red Flag Commission recommended that a written cooperative agreement be developed between the Board of Police Commissioners and the City Council in order to "establish more uniformity and control in the expenditure of City funds and in order to maximize efficiencies in the use of those funds."<sup>22</sup> Our audit produced no evidence that the city and Police Department had taken steps toward developing a written cooperative agreement.

### **Unique structural relationship must be recognized and addressed.**

The Police Department and city are separate and distinct entities with little formal codification of the relationship between the two. The Police Department and the city are each controlled by separate and unique governing bodies. The Board of Police Commissioners is appointed by and accountable to the governor of the State of Missouri and the City Council is elected by and accountable to the voters of the City of Kansas City.

The efficient and effective delivery of services and proper control and stewardship of public dollars requires that the Police Department and city work together. Neither can command or control the other, yet neither can fulfill its mission alone. Members of the City Council and Police Board need to identify opportunities for cooperation and coordination, clarify expectations, and agree on roles and responsibilities. City and Police Department management staff have a difficult time working well together in the absence of clear policy direction from each of the governing bodies.

**Opportunities to improve controls and efficiencies exist.** The City Auditor's Office identified potential opportunities to increase coordination and reduce duplication of administrative processes in the June 1996 report *Preliminary Review: Kansas City, Missouri Police Department*. We suggested administrative activities such as building maintenance, purchasing, human resources (civilian hiring, pension and benefit administration), payroll, accounting, and computer services and support might lend themselves to consolidation efforts. The report also

<sup>21</sup> Charter section 25 creates the internal auditor department. Charter section 76.5 describes the appointment, qualifications, duties, relationship to the city auditor, access to information, and removal of the internal auditor.

<sup>22</sup> *Red Flag Commission Report*, p. 3.

suggested that internal controls should be strengthened. While further audit work would be necessary, we continue to believe that efficiency could be increased and costs reduced with the consolidation and coordination of Police Department and city administrative functions.

We were able to identify some steps being taken towards combining administrative activities. The police maintenance garage is performing routine passenger car maintenance for the Fire Department. Also, during the March 1998 budget hearings, the chief of police proposed that the city and Police Department begin working together on salary issues. Councilmembers also suggested the possibility that the city and department work together on health coverage and other issues. We recognize the positive steps that are being considered in consolidating administrative processes. However we were still unable to identify steps that had been taken towards the development of a written cooperative agreement between the Board of Police Commissioners and City Council.

**Written cooperative agreement needed.** We believe that the citizens of Kansas City would be well served by a written cooperative agreement, adopted by the Board of Police Commissioners and the City Council. Such an agreement could be a useful foundation for developing a more productive relationship between the two entities. The document could recognize that the entities are equal partners and identify the roles and responsibilities of each. The cooperative agreement could also address the following issues:

- Uniformity and control in the expenditure of city funds
- Maximizing the efficient use of the city's public safety funds
- Regular scheduling of joint meetings
- Methods of improving communications between the entities

The development of a written cooperative agreement is dependent on the support and cooperation of the mayor, members of the City Council, and the Board of Police Commissioners. The mayor, as a member of both the City Council and Police Board of Commissioners, is the logical person to play a lead role in facilitating the development of a cooperative agreement between the city and Police Department.

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## Recommendations

1. The city manager should incorporate the "Elements of a Good Monitoring System" into all relevant administrative regulations relating to contracts.
2. The city manager should incorporate all referenced guidelines into the relevant administrative regulations.

3. The city manager should develop a policy requiring his office and the City Council to be informed of decisions regarding all contracts that are exceptions to regular procedures.
4. The city manager should develop a policy requiring that a central contracting authority review contracts, maintain a master contract file, and provide contracting assistance to operating departments.
5. The city manager should assign responsibility for updating the contract guidebook and for training staff on city contracting procedures.
6. The city manager should draft an ordinance for council consideration updating the city's Code of Ethics to incorporate the definition of proper and improper contact between members of the City Council and city staff.
7. The city manager should develop procedures to follow when an employee believes that the proper lines of authority and responsibility have been breached.
8. The city manager should ensure that annual ethics training, including clear definitions of appropriate and inappropriate contact, for all city and contract employees, elected officials, paid and unpaid staff, and appointed members of boards and commissions begins. Ethics training should be included in new employee orientation as soon as the program and materials are available.
9. The city manager should include in his budget sufficient funding to provide initial councilmember ethics training by outside instructors.
10. The city manager should furnish orientation training updates to the City Council and mayor as required by code section 2-1012.5 (c).
11. The city manager should ensure that the city's Code of Ethics and other ethics related rules and procedures are publicized.
12. The city manager should prepare an ordinance for City Council consideration establishing a confidential hotline.
13. The city manager should request that the Law Department revise the language of Resolution 961329 to reflect the August 1998 charter changes in preparation for consideration by the next mayor and council.
14. The city manager should appoint an internal auditor.
15. The mayor should take steps to secure a written cooperative agreement between the city and Police Department.

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## **Appendix**

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### **City Manager's Response**





## Office of the City Manager

**DATE:** December 10, 1998

**TO:** Mark A. Funkhouser, City Auditor

**FROM:** Robert L. Collins, City Manager

**SUBJECT:** REVISED Response to Performance Audit-Implementation of the Red Flag Commission's Report Recommendations

I have reviewed the recommendations in the Performance Audit of the Implementation of the Red Flag Commission's Report Recommendations conducted by your office. I am in concurrence with all of your recommendations. The City Manager's Office is in the process of implementing those recommendations.

I would like to point out that City staff from many departments have spent thousands of hours in addition to regular duties to design the contract guidebook, ethics training and hot line. Their efforts have resulted in the design of a coordinated, efficient, and consistent approach to contract administration and an employee development program including ethical standards and comprehensive contract administration skills.

I have assigned permanent responsibility for development and implementation of Red Flag Commission recommendations to staff in my office. I informed the Red Flag Commission at their October 2, 1998 meeting that I had assigned an Assistant to the City Manager to serve as the central contracting authority for the City. We are in the process of reviewing the work done by staff on a volunteer basis over the last two years to implement the recommendations. My assistant will be responsible for implementing audit recommendations #1-5.

An Assistant City Manager is chairing the Administrative Ethics Committee. This committee is working with Councilman Kelvin Simmons, Councilman George Blackwood, two members of the Red Flag Commission and the Office of Education and Development to design the necessary components for the implementation of audit recommendations #6-12.

The City Manager and staff are committed to designing and implementing an integrated ethics program. Substantial progress has been made toward implementation in early 1999. Much work had to be done before the entire program could be implemented. This included:

- Approval by the Missouri Legislature of the confidentiality of reports to an Ethics Hot Line;
- Voter approval of a charter change to establish an internal auditor position;

Mark Funkhouser  
December 10, 1998  
Page #2

- Search and hiring of an internal auditor and development of job description;
- Research, coordination of work between Council and staff and for final consensus on definitions of appropriate conduct between Council and staff;
- Research and design of an ethics code, training materials and curriculum for ethics training for all employees;
- Developing Code of Ethical Principles;
- Research and design of an Ethics Hot Line, request for proposals for maintenance of the Hot Line and investigative procedures and responsibilities; and
- Redesign of Council orientation program.

**Recommendation #1 The City Manager should incorporate the "Elements of a Good Monitoring System" into all relevant administrative regulations relating to contracts.**

The City Manager's office agrees with this recommendation. We have revised AR 3-15 and 3-20. We will begin the work to revise AR 3-7 and 3-12 to include the elements of a good monitoring system reflected in Exhibit 2 of the Follow Up Audit.

**Recommendation #2 The City Manager should incorporate all referenced guidelines into the relevant administrative regulations.**

The City Manager's Office agrees with this recommendation. Our central contracting authority will review the guidelines and include them with the administrative regulations or remove them from the administrative regulations and incorporate them in the contract guidebook.

**Recommendation #3 The City Manager should develop a policy requiring his office and the City Council to be informed of decisions regarding all contracts that are exceptions to regular procedures.**

The City Manager agrees with this recommendation. The contract guidebook already refers departments to the Law Department to handle exceptions to regular procedures because each situation is different. A process is being developed to inform the City Council and the City Manager of exceptions.

**Recommendation #4 The City Manager should develop a policy requiring that a central contracting authority review contracts, maintain a master contract file, and provide contracting assistance to operating departments.**

The City Manager's Office agrees with this recommendation. As noted earlier an Assistant to the City Manager is serving as the central contracting review authority who is responsible for implementing this recommendation.

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Mark Funkhouser  
December 10, 1998  
Page #3

**Recommendation #5 The City Manager should assign responsibility for updating the contract guidebook and for training staff on city contracting procedures.**

The City Manager's Office agrees with this recommendation. The central contracting review authority will work with department representatives, Law Department, and Information Technology to update the contract guidebook. Existing contracting staff will be selected and trained to conduct training on the contract guidebook for departmental employees.

**Recommendation #6 The City Manager should draft an ordinance for council consideration updating the city's Code of Ethics to incorporate the definition of proper and improper contact between members of the City Council and City staff.**

The City Manager's Office agrees with this recommendation. The Council Ethics Relations Committee is preparing a definition of proper and improper contact between members of the City Council and City staff. The City Manager's Administrative Ethics Committee is also working on a definition. The Chair of the Administrative Ethics Committee will work with the Council Ethics Relations Committee to reach consensus on a final definition. An ordinance will then be drafted for Council approval of the definition. The definition will be used in all ethics training for elected and appointed officials and employees.

**Recommendation #7 The City Manager should develop procedures to follow when an employee believes that the proper lines of authority and responsibility have been breached.**

The City Manager's Office agrees with this recommendation. Staff reviewed procedures utilized by the City of Orlando, Farmland Industries, and Associated Wholesale Grocers. Procedures are now being developed and will be given to employees prior to implementation of the hot line. Procedures will also be included in the ethics handbook and training for employees.

**Recommendation #8 The City Manager should ensure that annual ethics training, including clear definitions of appropriate and inappropriate contact, for all city and contract employees, elected officials, paid and unpaid staff, and appointed members of boards and commissions begins. Ethics training should be included in new employee orientation as soon as the program and materials are available.**

The City Manager's Office partially agrees with this recommendation. The Office of Education and Development does feel that top managers should be trained in ethics first. Then all other employees as well as new employees in orientation will be trained. Further, annual refresher training is planned thereafter for employees.

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Mark Funkhouser  
December 10, 1998  
Page #4

**Recommendation #9 The City Manager should include in his budget sufficient funding to provide initial council member ethics training by outside instructors.**

The City Manager's Office agrees with this recommendation and has already budgeted for this training.

**Recommendation #10 The City Manager should furnish orientation training updates to the City Council and Mayor as required by code section 2-1012.5 (c).**

The City Manager's Office agrees with this recommendation. We will work with Councilman Simmons and Councilman Blackwood, and the City Attorney to determine the appropriate topics for the first update.

**Recommendation #11 The City Manager should ensure that the city's Code of Ethics and other ethics related rules and procedures are publicized.**

The City Manager's Office agrees with this recommendation. Staff already included this in the draft of the Ethics Handbook. The final version of the handbook will be given to all employees during ethics training. A plan for publicizing the Ethics Code, Ethical Principles and hot line is being developed.

**Recommendation #12 The City Manager should prepare an ordinance for City Council consideration establishing a confidential hot line.**

The City Manager's Office agrees with this recommendation. Staff will prepare the ordinance upon completion of the design of the hot line program and investigative procedures.

**Recommendation #13 The City Manager should request that the Law Department revise the language of resolution 961329 to reflect the August 1998 charter changes in preparation for consideration by the next mayor and council.**

The City Manager's Office agrees with this recommendation. Staff is preparing the request to the Law Department to revise resolution 961329.

**Recommendation #14 The City Manager should appoint an internal auditor.**

The City Manager's Office agrees with this recommendation. We are in the process of further clarifying responsibilities for this position. The position was advertised, and we have obtained resumes of candidates interested in the position.

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Mark Funkhouser  
December 10, 1998  
Page #5

**Recommendation #15 The Mayor should take steps to secure a written cooperative agreement between the City and Police Department.**

The City Manager and staff are ready to provide any information necessary to the Mayor in order to implement this recommendation.

In the interim City staff will continue to pursue informal agreements to coordinate purchasing and services to reduce expenditures.



Robert L. Collins

RLC:emm

cc: Assistant City Managers  
John Franklin, Assistant to the City Manager

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